

FILED**MAY 15 2013****UNITED STATES DISTRICT COURT**

for the

Southern District of Illinois

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

Time Records Publishing Inc. _____)
 Bobby Martin Productions Inc. _____)
 2537 Wards Mill Road _____)
 Marion, Illinois 62959 _____)

Plaintiff

v.

Jennifer Perkins _____)
 Kevin Perkins _____)
 1685 S.W. James Port Drive _____)
 Port St. Lucie, Florida 34952 _____)

Defendant(s)

Case Number:

13-465-JPG-DGW
(Clerk's Office will provide)**PRO SE CIVIL RIGHTS COMPLAINT****(Non-Prisoner)****I. JURISDICTION**

Subject matter jurisdiction is invoked under 28 U.S.C. § 1331, 28 U.S.C. § 1343(a)(3), and/or 42 U.S.C. § 1983. List any additional bases for federal subject matter jurisdiction here:

Jennifer and Kevin Perkins are currently under investigation for fraud, identity theft, illegally obtaining a device to use on their mobile phones to accept credit cards for the sell of merchandise under Time Records Publishing Inc. EIN number without authorization. Reported to IRS, FTC, & FBI. The investigation is current and ongoing, has been verified by letters received to plaintiff, see attached. Plaintiff also receiving numerous threats by defendants/associates.

II. PARTIES**Plaintiff:**

A. Plaintiff, a citizen of _____ Illinois _____ (state), who resides at

_____ 2537 Wards Mill Road, Marion 62959 _____, alleges that his/her

civil rights were violated by the individual(s) named below.

Defendant #1:

B. Defendant _____ Jennifer Perkins _____ is employed as

(a) _____ (Name of First Defendant)

_____ Port St. Lucie Sheriff's Dept/ Correctional Officer _____

(b) _____ (Position/Title)

with Port St. Lucie Sheriff's Dept.
(c) (Employer's Name and Address)

4700 W. Midway Road Fort Pierce, Florida 34981

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain:

She is employed as a correctional officer at the Port St. Lucie Jail. She also involved the Sheriff's Dept and other employees.

Check one of the following:

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Defendant #2:

C. Defendant Kevin Perkins is employed as
(Name of Second Defendant)

Port St. Lucie Sheriff's Dept/ Correctional Officer
(Position/Title)

with Port St. Lucie Sheriff's Dept.
(Employer's Name and Address)

4700 W. Midway Road Fort Pierce, Florida 34981

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain:

He is employed as a correctional officer at the Port St. Lucie Jail. He also involved the Sheriff's Dept and other employees.

Check one of the following:

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Defendant #3:

D. Defendant None is employed as
(Name of Third Defendant)

(Position/Title)

with _____
(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #3 employed by the state, local, or federal government? ☐ Yes ☐ No

If you answer is YES, briefly explain:

Check one of the following:

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Additional Defendant(s) (if any):

E. Using the outline set forth above, identify any additional Defendant(s), using additional pages, if necessary.

III. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in this federal court?

☐ Yes ☒ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline.

1. Parties to previous lawsuits:

Plaintiff(s): Time Records Publishing Inc.
Bobby Martin Productions Inc.

Defendant(s): Motown Records Inc.
Universal Music Group Inc.

2. Case number:

3. Name of Judge to whom case was assigned:

4. Disposition of case (for example: Was the case dismissed? Was it appealed?
Is it still pending?):

Arbitrary Settlement
Dismissed

IV. STATEMENT OF CLAIM

State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege several related claims, number and set forth each claim in a separate paragraph.

Jennifer Perkins and Kevin Perkins both are currently under investigation for fraud, identity theft, illegally obtaining a device to use on their mobile phones to accept credit cards for the sell of merchandise under Time Records Publishing Inc. Use of EIN number without authorization. Official complaint filed to IRS, FTC, & FBI. The investigation is current and ongoing, has been verified by letter form the IRS received, by plaintiff, see attached. Plaintiff also receiving numerous threats by defendant, and her associates.

Jennifer Perkins is in violation of the Musical Recording Contract, Confidentiality Agreement, Venue Performing Contracts and Letter To Hold Harmless Agreement that she has signed, see attached documentations.

We hold the Copyright SR 718-957 to the album released August 8th 2013, entitled; "Reflections" artist "Jaia" also known as Jennifer Perkins.

Which Constitutes Copyright Infringement, Breach Of Contracts.

We pray for an immediate injunction for relief;

Jennifer Perkins was sent by our distributors: CD BABY, 200 Cd's of which she confiscated and refused to pay the company as per agreement. Jennifer Perkins confiscated, and refused paying for 100 of the Cd's owing \$2000.00. Receipts are attached.

To surrender all materials belonging to Time Records Publishing Inc. Which include merchandise, pictures, monies, any other material in their possession.

Previously requested in a Cease and Desist Notification on January 18, 2013 in which request was ignored, threats ensued after said date starting on January 20, 2013.

V. REQUEST FOR RELIEF (*check as many boxes as appropriate*)

Plaintiff requests that the court grant the following relief:

Compensatory damages in the amount of \$ _____.

Punitive damages in the amount of \$ _____.

An ordering requiring defendant(s) to:

Stop selling materials and pirated materials permanently. Stop all harassment, threats, condescending and disparaging remarks against the personnel and staff, via the Internet and Social Media. Provide information as to the bank/banks responsible for opening accounts in our name to her personal account/accounts. Documentation attached.

A declaration that:

To surrender all materials belonging to Time Records Publishing Inc. Which include merchandise, pictures, Monies, any other material in their possession, that we were not made aware of. Previously requested a Cease and Desist on January 18, 2013 in which request was ignored but threats ensued after said date starting on January 20, 2013.

Other:

Jennifer Perkins is in violation of the Musical Recording Contract, Confidentiality Agreement, Venue Performing Contracts and Letter To Hold Harmless Agreement that she has signed, see attached documentations. We hold the Copyright SR 718-957 to the album entitled "Reflections" artist Jaia also know as Jennifer Perkins.

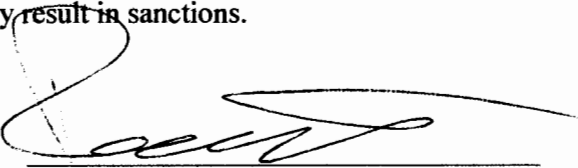
VI. JURY DEMAND (*check one box below*)

Plaintiff ☒ does or ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 5-15-13
(date)

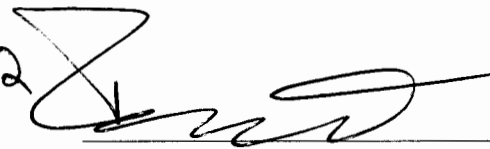

Signature of Plaintiff

2537 Wards Mill Road
Street Address

Robert Martin a/k/a/ Bobby Martin CEO
Printed Name

Marion, Illinois 62959
City, State, Zip

8. After the complaint is filed, the original of any motion, pleading, or other paper submitted for consideration by the court should be filed with the clerk's office. You must also mail a copy of that document to all other parties, or if they have counsel, to their attorneys. When you file your paper with the clerk's office, you must include a **Certificate of Service**, using the format shown below. Any pleading or other document received by the court that fails to include a certificate of service may be disregarded.

<u>CERTIFICATE OF SERVICE</u>	
I certify that a copy of this	<u>Pro Se Civil Right Complaint</u> <small>Was mailed/delivered</small>
(Name of Document)	
to <u>Jennifer + Kevin Perkins</u>	on <u>5-15-13</u>
(Name and Address of Party/Attorney)	(Date)
<u>1685 S.W. Jamesport Dr.</u>	
<u>Port St. Lucie, Florida 34952</u>	
	
	Signature
	<u>Robert Martin</u>
	Printed Name
	<u>A/K/A Bobby Martin</u>

9. Do not write letters to judges or magistrate judges regarding your case. Such contact is improper. If you wish to provide information or ask the court to do something, you must file a motion with the clerk's office.
10. You are responsible for learning and following the procedures that govern the court process. The district judges, magistrate judges, clerk of court, and their staff are forbidden as a matter of law from providing legal advice. Legal advice should be sought from an attorney or legal clinic.
11. You are under a continuing obligation to keep the clerk's office and each opposing party informed of any change in your address. This shall be done in writing and not later than 7 days after a change in address occurs. **Failure to do so may result in dismissal of your case.**